

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

**ASSENTED-TO MOTION FOR LEAVE TO FILE REPLY TO GOVERNMENT'S  
OPPOSITION TO MOTION TO DISMISS**

Now comes the defendant Sean O'Donovan, by and through undersigned counsel, and hereby respectfully requests leave to file a Reply to the government's Opposition to his Motion to Dismiss the Indictment in this case. As grounds and reasons for his request, Mr. O'Donovan states that a Reply is necessary to fully address the complex legal issues presented by his Motion and the government's Opposition. Wherefore, Mr. O'Donovan respectfully requests that he be granted leave to file his Reply on or before September 27, 2022.

## **COMPLIANCE WITH LOCAL RULE 7.1(a)(2)**

Undersigned counsel conferred with the Government, and the Government assents to this request for leave to file, but opposes the relief requested in Mr. O'Donovan's underlying Motion to Dismiss.

Respectfully Submitted,  
SEAN O'DONOVAN  
By His Attorney,

/s/ Martin G. Weinberg  
Martin G. Weinberg, Esq.

Mass. Bar No. 519480  
20 Park Plaza, Suite 1000  
Boston, MA 02116  
(617) 227-3700  
owlmgw@att.net

Dated: September 15, 2022

**CERTIFICATE OF SERVICE**

I, Martin G. Weinberg, hereby certify that on this date, September 15, 2022, a copy of the foregoing document has been served via Electronic Court Filing system on all registered participants.

**/s/ Martin G. Weinberg**  
Martin G. Weinberg, Esq.